

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 V.) 20 CR 309-1
) Judge Virginia M. Kendall
 LARRY JONES,)

**OBJECTION TO THE FILING AND CONSIDERATION OF THE
GOVERNMENT'S SENTENCING MEMORANDUM**

Defendant Larry Jones, by his attorney Phillip A. Turner, respectfully submits the following as his objection to the filing and consideration of the government's sentencing memorandum, which was filed on July 13, 2023, at 9:54 pm:

1. Defendant Jones pleaded guilty on January 19, 2023, and this Court ordered that the government and defendant file their respective sentencing memoranda on April 7, 2023.
2. Pursuant to this Court's order, defendant Jones filed his sentencing memorandum on April 7, 2023. Docket #184. The government filed nothing.
3. On July 13, 2023, three months after the court ordered filing date, the government filed its sentencing memorandum. The government did not file a motion for leave to file its sentencing memorandum stating good cause as to why the government believes that the government has good cause to file

its sentencing memorandum three months late. The government filed its memorandum six days prior to the sentencing hearing scheduled for July 19, 2023. The government's sentencing memorandum makes allegations of uncharged conduct regarding drug transactions and defendant's involvement in a murder. Defendant does not want to wait to make this objection at the sentencing hearing in order to conserve the court's time.

Wherefore, defendant Jones objects to the filing and consideration of the government's sentencing memorandum.

Respectfully submitted,
/s/ Phillip A. Turner
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the following document:

**OBJECTION TO THE FILING AND COSIDERATION OF THE
GOVERNMENT'S SENTENCING MEMORANDUM**

was served in accordance with Fed.R.Crim.P. 49, and L.R.5.5, and the
General Order on Electronic case Filing (ECF) pursuant to the district
court's system as ECF filers.

Respectfully submitted,

/s/ Phillip A. Turner
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